

January 29, 2008

INTERPLASTIC CORPORATION Thermoset Resins Division

2015 NE Broadway St. Minneapolis, Minnesota 55413-1775 (651) 481-6860 Fax (612) 331-4235



Compliance Tracking Coordinator Major Facilities Section Metro District Minnesota Pollution Control Agency 520 Lafayette Road North Saint Paul, MN 55155-4194

RE: July- December 2007 Semi-annual Deviation Reports DRF-1 and DRF-2;

2007 Certification Report CR-04 for 2007 Reporting 2007 Annual VOC Report for 2007 Calendar Year

Interplastic Corporation, 2015 NE Broadway St., Minneapolis, MN 55413 Air Emissions Permit No. 05300251-001 issued December 20, 2000

Dear Supervisor,

Please find enclosed the above referenced reports for the facility noted above. These reports are required by Air Emissions Permit No. 05300251-001 Title V (Part 70) Total Facility Air Emission Permit, Issued December 20, 2000.

Please contact Sheri Peterson at (651) 757-3983 direct or (651) 481-6860, ext. 313 if you have any additional questions regarding the information provided.

INTERPLASTIC CORPORATION

By: Hocutt Phillips

Chief Environmental Officer

08SP010

Copy: Martin Frank, Plant Manager, Minneapolis Plant

Hocuth Philleps (50)

Sheri Peterson, Site Manager-HSEQ, Minneapolis Plant

Mr. George Czerniak, Chief, Air Enforcement & Compliance Assurance Branch,

EPA Region V, 77 West Jackson Blvd, Chicago, IL 60604



DEVIATION REPORTING FORM DRF-1 NTINUOUS MONITORING SYSTEMS

DEVIATIONS RECORDED BY CONTINUOUS MONITORING SYSTEMS

Use this form to record and report deviations that are identified by *Continuous Monitoring Systems*. This includes Continuous Emission Monitoring Systems (CEMS), Continuous Opacity Monitoring Systems (COMS), and any other monitoring system in which the monitor's output is recorded continuously.

GENERAL FACILITY INFORMATION

Facility Name: Interplastic Corporation AQ Facility ID: 05300251

Report Covers Quarter: July to December Year: 2007

DEVIAT	TONS SU	MMA	RY T	ABLE			D	urat	ion o	f CN	1S I)own	time	;	Dur	atior	of I	Devia	ation	ıs	
Monitor ID No.	Pollutant or Para- meter	EU or SV	EU/ SV ID No.	Emission Limit and Averaging Period	Total Operating Hours in Quarter	Monitor Malfunction	Non-Monitor Malfunction	QA Calibration	Other Known Causes	Unknown Causes	Total Duration	% of Operating Time	Startup/Shutdown	Control Equipment	Process Problems	Soot Blowing	Fuel Problems	Other Known Causes	Unknown Causes	Total Duration	% of Operating Time
CE001	VOC	SV	001	NA	2208.00 3 rd Qtr		!							X	X			X		5.47 hrs**	0.25
													*= Iı	nclud	les 1.5	hour	s of I	Excel	Ener	gy power out	age
CE001	VOC	SV	001	NA	2031.30 4 th Qtr								X	X	X		X	X		5.35 hrs	0.26 (*2)
													plan	ned r	naint	enanc	e or (5.75 h	ours	•	only for or preparation rating temp.

DEVIATIONS: Provide the following information regarding each individual deviation identified by a continuous monitoring system (CMS).

Emission	Monitor	Pollutant	Beginning	End Date	Actual Level of	Cause of Deviation and Corrective Action Taken
Unit ID	ID No.	or	Date and	and Time	Deviation	, in the second
No.		Parameter	Time of	of]	
		Monitored	Deviation	Deviation		
SV001	CE001	VOC	07-04-07	07-04-07	0 hr, 4 min	No flame seen by Hirt fire eye. Hirt reset without
			3:23 am	3:27 am		incident.
SV001	CE001	voc	07-08-07	07-08-07	0 hr, 2 min	Low nitrogen supply-low nitrogen pressure. Hirt rese
			1:39 am	1:41 am		without incident.
SV001	CE001	VOC	07-17-07	07-17-07	0 hr, 4 min	No flame seen by Hirt fire eye. Hirt reset without
			1:16 pm	1:20 pm		incident.
SV001	CE001	VOC	07-18-07	07-18-07	2 hr, 5 min	No flame seen by Hirt fire eye. On call maintenance
			6:33 pm	8:38 pm		required to reset Hirt.
SV001	CE001	VOC	09-07-07	09-07-07	1 hr, 28 min	Excel Energy power outage. Power restored.
			8:10 pm	9:38 pm		
SV001	CE001	VOC	09-21-07	09-21-07	0 hr, 15 min	Hirt fell below temp but did not go down. Raised set
			1:05 pm	1:20 pm		point to higher operating temp.
SV001	CE001	voc	09-24-07	09-24-07	0 hr, 22 min	No flame seen by Hirt fire eye. Hirt reset without
			4:33 am	4:55 am		incident. No flow on pollution control corrected.
SV001	CE001	VOC	09-30-07	09-30-07	1 hr, 8 min	Pilot spark plug on Hirt gummed up and cleaned. Hirt
			4:20 am	5:28 am _		reset without incident.
SV001	CE001	voc	11-11-07	11-16-07	123 hr, 12 min	Scheduled maintenance on Hirt. Loading/mixing
				 		emissions only. No reactor or thin tank activity.
SV001	CE001	VOC	11-28-07	11-29-07	4 hr, 21 min	No flame seen. Below temp during investigation.
			11:00 pm	3:21 am		Increased air pressure of combustion air following
						scheduled maintenance activity.
SV001	CE001	voc	12-01-07	12-01-07	0 hr, 16 min	No flame seen. Below temp during further adjustment
			12:46 pm	1:02 pm		of air pressure of combustion air following scheduled
						maintenance activity.
SV001	CE001	voc	12-12-07	12-12-07	0 hr, 2 min	Pretest (lowered operating temp) for 12-13-07
			1:18 pm	1:20 pm		performance test.
SV001	CE001	voc	12-12-07	12-12-07	0 hr, 43 min	Pretest (lowered operating temp) for 12-13-07
			2:02 pm	2:45 pm		performance test.
SV001	CE001	VOC	12-13-07	12-12-07	7 hr, 54 min	12-13-07 Performance test at lower operating
			11:30 am	7:24 pm		temperature.
SV001	CE001	VOC	12-17-07	12-17-07	0 hr, 34 min	Trial switch to reserve fuel (propane). Lost pressure ar
]	9:52 am	10:26 am		switched back to natural gas.

MONITOR DOWNTIME: Provide the following information regarding each period of monitor downtime.

Monitor ID No.	Pollutant or Parameter Monitored	Emission Unit Being Monitored	Beginning Date and Time of Downtime	End Date and Time of Downtime	Total Duration of Downtime (Minutes)	Reason for Monitor Downtime and Corrective Action Taken
NA	NA	CE001	**	**	**	The only monitor down time was associated with the power outage 9-07-07 noted above in the deviations report.

MONITOR BYPASSES: Provide the following information for each period in which an emission unit is operating but is not being monitored because emissions were either partially or totally diverted around the monitoring system.

Monitor ID No.	Emission Unit Required to be Monitored	Pollutant and limit Required to be Monitored	Date and Time of Beginning of Bypass Period	Date and Time of End of Bypass Period	Duration of Monitor Bypass (Minutes)	Was P.C.E. Operating During Bypass Period?	Reason for Monitor Bypass and Corrective Action Taken
NA	NA	NA	NA	NA	NA	NA	There were no monitor bypasses during the reporting period except during reported planned Hirt maintenance in 11-11-07 to 11-16-07.
				· · · · · · · · · · · · · · · · · · ·			·
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CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature of Responsible Official

Hocutt Phillips

Printed Name of Person Signing

Chief Environmental Officer

January 29, 2008

Title

Date

Forward To: Air Quality Compliance Tracking Coordinator

Minnesota Pollution Control Agency

520 Lafayette Road North St. Paul, MN 55155-4194



GENERAL FACILITY INFORMATION

Facility Name: Interplastic Corporation

DEVIATION REPORTING FORM DRF-2 DEVIATIONS IDENTIFIED BY PERIODIC MONITORING SYSTEMS OR THROUGH RECORDKEEPING

6/14/99

Use this form to record and report deviations that are identified by *Periodic Monitoring Systems or Recordkeeping*. "Periodic Monitoring System" means a monitoring system in which the monitor's output is not recorded continuously.

AO Facility ID: 05300251

Report Cov	ers From <u>J</u>	uly	7	o: <u>Dec</u>	ember		of <u>2007</u>		_(year).		•	
DESCRIPTidentified by downtime o	y a period	ic monitor										
Date of Deviation	Emission Unit ID No.	Monitor ID No.	Con- Whic	Permit dition h Was ed From		Descriptio	n of Deviation	n and (Correcti	ve Action	Taken	
There wer	e no perio	dic monit	oring s	ystem d	eviations	during	this report	ing pe	eriod.			
											•	
					- · · · · · · · · · · · · · · · · · · ·							
						·			·	·····		
		-							<u> </u>			
										<u> </u>	<u></u>	
DESCRIPT when a perio							llowing info	ormati	ion reg	arding o	each period	i
Date and Time of Missed Record	Monitor No.	£ .	ission ID No.	Para	tant or meter itored	Cause o	f the Monitor	r Down	time an	d Correc	tive Action T	`aken
There wer	e no perio	dic monit	oring s	ystem d	eviations	during	this report	ing pe	eriod.			

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								· · · · · · · · · · · · · · · · · · ·				

SUMMARY OF DEVIATIONS AND MONITOR DOWNTIME - Provide the following summary information. Fill out a separate row of the table *for each monitor*.

Monitor ID No. Readings Taken Readings Indicating Deviations Deviations

Total Number of Readings Indicating Deviations Percent of Readings Missed

There were no periodic monitoring system deviations during this reporting period.

DEVIATIONS DISCOVERED THROUGH RECORDKEEPING: In the following section, list each deviation that was discovered through recordkeeping (e.g. your fuel use records indicate that you exceeded your fuel use limits). Provide at least the date(s) of each deviation; level of deviation; emission unit and the cause of each deviation.

1.	There were NO deviations discovered through recordkeeping during this reporting period.
2.	·
3.	

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature of Responsible Official

Hocutt Phillips

Printed Name of Person Signing

Chief Environmental Officer

<u>January 29, 2008</u>

Title

Date

Forward To: Air Quality Compliance Tracking Coordinator Minnesota Pollution Control Agency 520 Lafayette Road North

St. Paul, MN 55155-4194



ANNUAL 12 MO VOC REPORT

GENERAL FACILITY INFORMATION

Facility Name: Interpla	astic Corporation, 2015 NE Broadway	St., Mpls, M	IN 55413
AQ Facility ID Number:	05300251		
This ANNUAL report covers t	he period of January 1-December 31,	2007	

ANNUAL 12 MONTH ROLLING VOC SUMMARY

EMISSION	VOLATILE ORGANIC COMPOUNDS- TOTAL	UNIT
VOC	5.30	TONS

CERTIFICATION

I certify that I have reviewed this facility's 12 Month Rolling Summary of VOCs for the calendar year stated and the data reported is accurate to the best of my knowledge.

Signature of Responsible Official

Hocutt Phillips

Printed Name of Person Signing

Chief Environmental Officer

Title

January 29, 2008

Date

Copies to:

Air Quality Compliance Tracking

Coordinator

Minnesota Pollution Control Agency

520 Lafayette Road North

Saint Paul, Minnesota 55155-4194

Suzanne B. Venem

Minnesota Pollution Control Agency

520 Lafayette Road North

Saint Paul, Minnesota 55155-4194